

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF

CHAPTER 13

TERRANCE W. WATSON

CASE# 16-03944-NPO

OBJECTION TO CONFIRMATION

Comes now RiverHills Bank, a secured creditor in the above referenced bankruptcy, and files this their objection to confirmation of the Chapter 13 bankruptcy plan, and would show unto the Court the following:

1.

That RiverHills Bank is a secured creditor having filed a claim in this bankruptcy, which is secured by a house located at 907 Vine Street, Port Gibson, Mississippi.

2.

That the amount of the claim is for \$4,319.12.

3.

That the security for said claim is a lot and a brick house, which is in good condition, and would certainly have a value well in excess of \$4,319.12.

4.

That according to the plan filed, the debtor is claiming that the lot and house have no value.

5.

That a hearing should be scheduled to address this objection prior to confirmation of bankruptcy plan.

WHEREFORE, PREMISES CONSIDERED, the petitioner respectfully

requests this Court to schedule this matter for hearing regarding this objection, prior to confirming the bankruptcy plan. The petitioner further requests, that after said hearing, this court find that the value of said property be in excess of the claim filed by RiverHills Bank, and the bankruptcy plan be amended to provide that the full secured claim of RiverHills Bank in the amount of \$4,319.12 be paid through the bankruptcy plan.

Or, if mistaken, then for such other, further or different relief as is right and proper and as is duty bound, petitioner will ever pray, etc.

RESPECTFULLY SUBMITTED on this the 3rd day of February, A.D. 2017.

RiverHills Bank

BY: 
Robert B. Andrews, Attorney

CERTIFICATE OF SERVICE

I, Robert B. Andrews, attorney for RiverHills Bank in the above styled and numbered cause, do hereby certify that I have this day mailed postage prepaid a true and correct copy of the above and foregoing Objection to Confirmation to Hon. Harold J. Barkley, Jr., Trustee, P.O. Box 4476, Jackson, MS 39296-4476, Hon. Michael E. Keyton, Attorney for Debtor, P.O. Box 686, Port Gibson, MS 39150, Mr. Terrance W. Watson, Debtor, 303 Mansion Street, Port Gibson, MS 39150.

SO CERTIFIED on this the 3rd day of February, A.D. 2017.


ROBERT B. ANDREWS

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